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April 22, 1992

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Ms. Donna M. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: RM-7933
Errata to Comments of
Group M Communications,
Inc., Licensee of WNNJ-
FM, Newton, NJ

Dear Ms. Searcy:

I hand you herewith an original and four copies of an
Errata to Comments of Group M Communications, Inc.,
Licensee of WNNJ-FM, Newton, NJ. It is respectfully
requested that this document replace the Comments of Group M
Communications, Inc., Licensee of WNNJ-FM, Newton, NJ filed
on Monday, April 20, 1992.

Very truly yours,

John Wells King (krl)
John Wells King

JWK/krl
Enclosures: 5

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Federal Communications Commission
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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)
)
Request for Review of the) RM-7933
Commission's Commercial FM)
Allotment and Licensing)
Policy)

Errata to
Comments of Group M Communications, Inc.
Licensee of WNNJ-FM, Newton, NJ

The following errata are submitted to the Comments of Group M Communications, Inc., Licensee of WNNJ-FM, Newton, NJ ("Comments") filed April 20, 1992. The errata are listed below under the sections in which they occur. A conformed corrected copy of the Comments is attached hereto as Exhibit A.

I. THE CURRENT FM ALLOCATION AND FACILITY IMPROVEMENT
POLICY IS WREAKING HAVOC ON A SMALL BUSINESS THAT IS
TRYING TO PROVIDE COMMUNITY SERVICE

1. Insert the word "the" between the words "on" and "locale" in the last clause of the sentence. (Page 1)

2. Correct the figure for Meters occurring within the parentheses in the third sentence of the paragraph to read "100" Meters instead of "328." (Page 2)

4. Insert the words "per capita" between the words "stations" and "in San Luis Obispo County" near the

III. THE FCC SHOULD ENACT RULES AFFECTING ALLOCATIONS AND
EXISTING FACILITY IMPROVEMENTS ALONG THE THOUGHT LINES
OF FCC 9297.

10. Insert parentheses around the phrase "radio's
only current source of revenue," which occurs between
"advertising dollars," and "the FCC." (Page 4)

IV RECOMMENDATIONS

11. Insert the words "local (county-based)"
between "other" and "stations" in the third sentence of the
paragraph. Capitalize the word "Census," the last word in
the paragraph. (Page 4)

Respectfully submitted,
GROUP M COMMUNICATIONS, INC.

By /s/ Michael B. Levine
Michael B. Levine
President

Yates Avenue, Box 40
Newton, NJ 07860

April 22, 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)
)
Request for Review of the) RM-7933
Commission's Commercial FM)
Allotment and Licensing)
Policy)

Comments of Group M Communications Inc.
Licensee of WNNJ-FM, Newton, NJ

Group M Communications Inc., licensee of WNNJ-FM, Class B-1, Newton, NJ ("WNNJ"), pursuant to Section 1.405 of the Rules of the Commission and the Public Notice, Report No. 1882, released March 20, 1992, hereby submits its Comments in support of the above-captioned Request filed by the National Association of Broadcasters ("NAB") on February 10, 1992 ("Request").

I. THE CURRENT FM ALLOCATION AND FACILITY IMPROVEMENT POLICY IS WREAKING HAVOC ON A SMALL BUSINESS THAT IS TRYING TO PROVIDE COMMUNITY SERVICE

1. New Jersey broadcasters, along with those in some other states (including California) are in diverse competitive situations, depending on the locale of the radio station.

2. As an example in New Jersey, WNNJ-FM is licensed to Newton, Sussex County. The county's population is approximately 135,000, and there are only three FCC-licensed commercial radio stations. There is one radio station for every 42,000 population, and the best facility is an under-powered Class B-1, (WNNJ-FM, Equivalent Radiated Power of

18,000 watts at 100 Meters.) Minimum separation requirements prevent any additional allocations in Sussex County or other counties that are in close proximity to major metro areas such as New York or Philadelphia.

3. However, in another part of the State, Cape May County, there are 9 (at last count) commercial radio stations licensed to serve a population of approximately 105,000. There is one station for every 12,000 people. Docket 80-90 allowed a dramatic influx of allocations here, despite the fact that the population could not support the additional facilities.

4. Similar disparate ratios apply in California if one compares the number of licensed stations per capita in Orange County to the number of licensed stations per capita in San Luis Obispo County.

5. Nationally, there are approximately 11,000 radio stations, serving a population of approximately 250,000,000, or roughly one station for every 23,000 population.

6. Existing FM facilities (those that were established prior to 1964) are often under-developed but are located in areas of dramatically increased population. For example, WNNJ-FM was licensed in 1961 with a facility approximately 40 miles from New York City. The county's population at the time was approximately 60,000. It is now approximately 135,000.

7. In the late 1980's the FCC revised section 73.213 of the Rules (the section that governed facility improvement of grandfathered, short-spaced FM stations) and severely impeded

any future improvement or relocation of transmitter sites. Where before, such a station could relocate and improve facilities based on distance and power levels authorized by the FCC for short-spaced stations, the new rules prevented any improvement that would lessen the distance between 1 mv/m contours of short spaced stations. The earlier rules had greater flexibility, especially with respect to 2nd and 3rd adjacent channels.

8. Thus, existing facilities in areas of high population density are currently severely restricted in their desires to upgrade, while the FCC Allocation Tables are allowing an over-supply of stations in areas that cannot economically support them.

II. THE FCC'S RECENT REPORT AND ORDER WITH RESPECT TO LMA'S AND DUOPOLY IS A CORRECT STEP

9. The FCC Report and Order 92-97 released April 10, 1992 in response to MM Docket No. 91-140 recognized the financial difficulties facing radio stations and provided new rules with respect to national and local ownership caps and Local Marketing Agreements in order to facilitate an improvement in the economic climate of the broadcaster.

III. THE FCC SHOULD ENACT RULES AFFECTING ALLOCATIONS AND EXISTING FACILITY IMPROVEMENTS ALONG THE THOUGHT LINES OF FCC 92-97.

10. In today's economic climate, and taking into consideration that local radio broadcasters are affected by emerging technologies such as Video Compression, DBS, DAB and

Cable Origination, all of which target advertising dollars, (radio's only current source of revenue,) the FCC should enact new rules for the allocation and development of FM and other facilities.

IV RECOMMENDATIONS

11. The allotment of new FM facilities should be governed not only by technical mileage separation requirements, but also by population per station. The FCC's process already requires a projection of population served by the 1 mv/m contour (in the case of Class B FM stations). The Commission could also require an analysis of all other Local (county-based) stations whose corresponding contours overlap the proposed station to determine exactly how much population there is per station. The threshold for new allocations could be on the order of the current national average, and could be upgraded with each Census.

12. The improvement of existing short-spaced facilities could be governed by the old 73.213 rules, providing such an improvement did not reduce the population per station below the national average.

V CONCLUSION

13. Future development of the FM service can be enhanced in an orderly fashion with the recommendations detailed above.

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14. These Comments were developed more in a general nature than with total specifics. WNNJ would be happy to enhance the Comments with greater detail if requested.

Respectfully submitted,
GROUP M COMMUNICATIONS, INC.

By Michael B. Levine, President

Yates Avenue, Box 40
Newton, NJ 07860

April 20, 1992